

All Law Division initial Case Management Dates will be heard via ZOOM.

For more information and Zoom Meeting IDs go to https://www.cookcountycourt.org/HOME/Zoom-Links/Agg4906_SelectTab/12

Remote Court date: 9/8/2022 10:00 AM

FILED
7/6/2022 10:17 AM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2022L005990
Calendar, B
18554151

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
LAW DEPARTMENT, FIRST DISTRICT

ANGELITA NOREN,)	
)	
Plaintiff,)	2022L005990
v.)	No.
)	
WALMART STORES, INC.,)	Amount Claimed: \$50,000.00+
)	
Defendant.)	

COMPLAINT AT LAW

NOW COMES the plaintiff, ANGELITA NOREN, by and through her attorneys, SKLARE LAW GROUP, LTD., and complaining of the Defendants, WALMART STORES, INC., hereby states as follows:

1. That on October 31, 2021, and prior and subsequent thereto, the Defendant, WALMART STORES, INC., was and remains a foreign corporation, duly organized and existing under and by virtue of the laws of the State of Illinois, engaged in the business, among other business, of a general store, selling food and general merchandise to the public.
2. That in connection with the operation of its business, the defendant, WALMART STORES, INC., owned, operated, managed, maintained and controlled, and/or otherwise contracted to own, operate, manage, maintain and control the business commonly known as and located at 10260 South Harlem, in the City of Bridgeview, County of Cook and State of Illinois.
3. That it then and there became and was the duty of the Defendant, WALMART STORES, INC., individually and by and through its agents, servants and employees on its behalf, to exercise reasonable care in and about the ownership, operation,

EXHIBIT A

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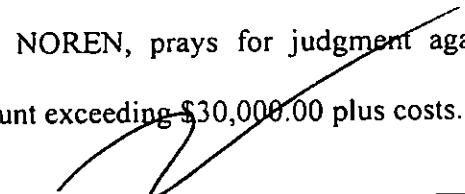
management, maintenance and control of said premises so that same would be in a good, safe and proper condition for persons legally and lawfully in and upon said premises to be, use, occupy and walk upon, and so as to not cause harm and injury to such persons.

4. That on said date of October 31, 2021 the Plaintiff, ANGELITA NOREN, was a business invitee, customer and patron of the Defendant, WALMART STORES, INC., and she was legally upon the aforesaid business premises.
5. On or about October 31, 2021, and for some period of time prior to October 31, 2021, spilt syrup was caused to be lying upon the floor of the grocery store in the aisle.
6. The spilt syrup presented an unreasonable risk of harm to Plaintiff.
7. Defendant knew or in the exercise of ordinary care should have known of the existence and the spilt syrup.
8. The spilt syrup was not an open and obvious condition.
9. Defendant could reasonably expect that plaintiff would be distracted by the very goods it displayed and not appreciate the existence of the spilt syrup or the danger it presented.
10. In violation of its duty, the Defendants, WALMART STORES, INC., individually and by and through its agents, servants and employees in its behalf, acted or failed to act in one or more of the following ways, amounting to careless and negligent conduct:
 - a. Failed to adequately secure the syrup within the display;
 - b. Failed to provide a safe place for the plaintiff to walk upon while in the premises;

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- c. Allowed and permitted produce to remain on the floor, creating a dangerous, unsafe and slippery condition;
 - d. Failed to inspect said premises to be certain same were free from the dangerous condition
 - e. Failed to warn the plaintiff and others of the unsafe, dangerous and hazardous condition of the floor;
 - f. Failed to place any barricades or other signs, to warn the plaintiff and others of the dangerous and unsafe condition of the floor;
 - g. Failed to clean up the spill;
 - h. Failed to inspect the syrup prior to placing it on the shelf to insure that it was not leaking;
11. That as a direct and proximate result of one or more of the foregoing careless and negligent acts of the Defendants, WALMART STORES, INC., Plaintiff, ANGELITA NOREN, was injured and suffered pain; incurred medical expenses; and was prevented from attending to or engaging in her occupation or employment; further the plaintiff suffered a loss of normal life.

WHEREFORE, the plaintiff, ANGELITA NOREN, prays for judgment against the Defendant, WALMART STORES, INC., in an amount exceeding \$30,000.00 plus costs.



Lee J. DiBiasio

SKLARE LAW GROUP, LTD.

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ANGELITA NOREN,

Plaintiff,

v.

WALMART STORES, INC.,

Defendant.

No. 2022L005990

Amount Claimed: \$50,000.00+

SUPREME COURT RULE 222 AFFIDAVIT

The undersigned, under penalties provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, certifies that the amount of compensatory damages to be sought in this matter exceeds \$50,000.00.

Date: 7/6/2022

Signed: _____

Lee J. DiBiasio

SKLARE LAW GROUP, LTD.

Attorneys for Plaintiff

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Chicago, IL 60602

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